

STATE OF CONNECTICUT OFFICE OF POLICY AND MANAGEMENT

OFFICE OF FINANCE

MEMORANDUM

TO:

State Agency Chief Fiscal Officers

FROM:

Robert S. Dakers, Executive Financial Officer

SUBJECT:

New Federal Reporting Requirements

DATE:

January 28, 2011

As you are likely aware, State agencies that receive certain federal funds are required to adhere to the new federal reporting requirements outlined in the Federal Funding Accountability and Transparency Act (FFATA) and the Office of Management and Budget (OMB) guidance dated August 27, 2010. An overview of the Act is presented as well as some useful links to related information.

The purpose of this memo is to: 1) provide some background regarding FFATA and its requirements; 2) ensure that agencies are aware of and take steps necessary to comply with these requirements; and 3) offer to answer any questions your agency may have in this regard.

Background: Federal Funding Accountability and Transparency Act (FFATA)

The FFATA was signed on September 26, 2006. The intent of the act is to empower every American with the ability to hold government accountable for each spending decision. The goal is to reduce wasteful spending in the government. The FFATA legislation requires information on federal awards be made available to the public via a single searchable website, which is www.usaspending.gov

The FFATA Sub award Reporting System (FSRS) is the reporting tool federal prime awardees (i.e. prime contractors and prime grant recipients) use to capture and report sub-award and executive compensation data regarding their first-tier sub-awards to meet the FFATA reporting requirements. A sub-award is defined generally as referring to a monetary award made as a result of a Federal award to a prime grant recipient (i.e. State agency) to a sub-recipient. The sub-award information entered into FSRS will then be displayed on www.usaspending.gov associated with the prime award furthering federal spending transparency.

Prime grant recipients awarded a new federal grant greater than or equal to \$25,000 as of October 1 2010 are subject to FFATA sub-award reporting requirements as outlined in the Office of Management and Budget guidance issued August 27, 2010. The prime awardee is required to file a FFATA sub-award report by the end of the month following the month in which the prime recipient awards any sub-recipient greater or equal to \$25,000. The reporting requirements are as follows:

- This requirement is for both mandatory and discretionary grants awarded on or after October 1, 2010
- All sub-award information must be reported by the prime awardee.

- For those new federal grants as of October 1, 2010, if the initial award is equal to or over \$25,000, reporting of sub-award and executive compensation data is required.
- If the initial award is below \$25,000 but subsequent grant modifications result in a total award equal to or over \$25,000, the award will be subject to the report requirements, as of the date the award exceeds \$25,000.
- If the initial award equals or exceeds \$25,000 but funding is subsequently de-obligated such that the total award amount falls below \$25,000. The award continues to be subject to the reporting requirements of the FFATA and OMB guidance.

The following data elements are required under the Act:

- Name of entity receiving the award
- Amount of award
- Funding agency
- NAICS code for contracts/CFDA program number for grants
- Program source
- Award title description of the purpose of the funding action
- Location of the entity (including congressional district)
- Place of performance (including congressional district)
- Unique identifier of the entity and its parent
- Total compensation and names of the top five executives (same thresholds as the primes)

It is our understanding that Federal agencies will notify State agencies of these new reporting requirements at the time of award. Please ensure that your agency meets these new federal reporting requirements. The following links are provided to assist you in this endeavor:

http://www.ffata.org/ffata/

https://www.fsrs.gov/

http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=109_cong_bills&docid=f:s2590enr.txt.pdf

https://www.fsrs.gov/documents/ffata legislation 110 252.pdf

http://www.regulations.gov/#!documentDetail;D=FAR-2010-0093-0001

https://www.fsrs.gov/documents/OMB Guidance on FFATA Subaward and Executive Compensation Reporting 08272010.pdf

Questions about FFATA

Any questions you or your agency may have regarding FFATA can be directed to Mike Riggott at the Office of Policy and Management, Office of Finance. Mike can be reached at (860) 418-6264 or Michael.riggott@ct.gov

Cc: Michael Riggott, Office of Finance, OPM